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Lead Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master No.: 3:07-cv-05944-SC
MDL No. 1917

This Document Relates to:

All Indirect Purchaser Actions

**DECLARATION OF LAUREN C.
CAPURRO IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5**

Date: November 13, 2015
Time: 10:00 a.m.
Courtroom: One, 17th Floor
Judge: Honorable Samuel Conti

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to
3 practice before this Court. I am an associate with the law firm Trump, Alioto, Trump &
4 Prescott, LLP and my firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs
5 (“IPPs”) in the above-captioned action. I make this declaration in support of the IPPs’
6 Administrative Motion to File Under Seal Pursuant to Civ. L. R. 7-11 and 79-5(d). Except
7 where otherwise stated, the matters set forth herein are within my personal knowledge and
8 if called upon and sworn as a witness I could competently testify regarding them.

9 2. On June 18, 2008, the Court approved a “Stipulated Protective Order” in
10 this matter (Dkt. No. 306) (the “Protective Order”).

11 3. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d),
12 Plaintiffs seek to file the following documents under seal:

13 a. Exhibits 4 and 8 to the Declaration of Mario N. Alioto In Support of
14 Indirect Purchaser Plaintiffs’ Motion for Award of Attorneys’ Fees,
15 Reimbursement of Litigation Expenses, and Incentive Awards to Class
16 Representatives.

17 4. The documents or portions of documents that Plaintiffs seek to file under
18 seal contain either (a) material designated by Defendants pursuant to the Stipulated
19 Protective Order as “Confidential” or “Highly Confidential” or (b) analysis of, references
20 to, or information taken directly from material designated by Defendants pursuant to the
21 Stipulated Protective Order as “Confidential” or “Highly Confidential.”

22 I declare under penalty of perjury under the laws of the United States that the
23 foregoing is true and correct. Executed this 23rd day of September, 2015 at San Francisco,
24 California.

25
26 /s/ Lauren C. Capurro
Lauren C. Capurro